

1 Shaun Setareh (SBN 204514)
shaun@setarehlaw.com
2 Thomas Segal (SBN 222791)
thomas@setarehlaw.com
3 SETAREH LAW GROUP
9454 Wilshire Boulevard, Suite 907
4 Beverly Hills, California 90212
Telephone (310) 888-7771
5 Facsimile (310) 888-0109

6 Attorneys for Plaintiff
ROXANNE SLUSHER

7
8 Yvette Davis (SBN 165777)
ydavis@hbblaw.com
HAIGHT BROWN & BONESTEEL LLP
9 2050 Main Street, Suite 600
Irvine, California 92614
10 Telephone: 714.426.4600
Facsimile: 714.754.0826

11 Mark A. Knueve (*Admitted Pro Hac Vice*)
maknueve@vorys.com
12 Daniel J. Clark (*Admitted Pro Hac Vice*)
djclark@vorys.com
13 George L. Stevens (*Admitted Pro Hac Vice*)
glstevens@vorys.com
14 VORYS, SATER, SEYMOUR & PEASE LLP
15 52 East Gay Street, P.O. Box 1008
Columbus, Ohio 43216-1008
16 Phone: 614.464.6436
Fax: 614.464.8054

17 Attorneys for Defendants BIG LOTS STORES,
18 INC. and BIG LOTS F&S, INC.

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21

22 ROXANNE SLUSHER, on behalf of herself,
23 all others similarly situated, and the general
public,

24 *Plaintiff,*

25 vs.

26 BIG LOTS STORES, INC., an Ohio
corporation; BIG LOTS F&S, INC., an Ohio
27 corporation; and DOES 1 through 50,
inclusive,

28 *Defendants.*

Case No. 17-cv-06030-RS

Assigned For All Purposes To The Honorable
Richard Seeborg, Courtroom 3

**JOINT STIPULATION TO CONTINUE
CLASS CERTIFICATION BRIEFING AND
HEARING; [~~PROPOSED~~] ORDER**

Action Filed: September 21, 2017
Trial Date: Not Set

1 This Stipulation is made by and between Plaintiff ROXANNE SLUSHER ("Plaintiff") and
2 Defendants BIG LOTS STORES, INC. and BIG LOTS F&S, INC. ("Defendants") (collectively
3 with Plaintiff, the 'Parties'), through their respective counsel of record, with reference to the
4 following facts:

5 WHEREAS, on, September 21, 2017, Plaintiff filed the original complaint in the action
6 alleging wage and hour violations of California Labor Code and similar California laws against
7 Defendants;

8 WHEREAS, on May 17, 2018, this Court set a deadline for Plaintiff to file her Class
9 Certification motion by March 31, 2019 (ECF No. 40);

10 WHEREAS, on June 7, 2018, per the parties joint stipulation, Plaintiff filed her Third
11 Amended Complaint (ECF No. 42-3);

12 WHEREAS, the parties need time to conduct discovery, review documents and contact class
13 members to prepare their briefs regarding class certification;

14 WHEREAS, the parties agreed to continue Plaintiff's class certification deadline to allow
15 discovery to take place;

16 THEREFORE, the Parties hereby stipulate and agree as follows:

- 17 1. Plaintiff's deadline to file her motion for class certification is continued from March 31,
18 2019 to July 1, 2019;
- 19 2. The hearing on Plaintiff's motion for class certification is continued from June 13, 2019
20 at 1:30pm to November 28, 2019 at 1:30pm, or another date that is convenient to the
21 Court.

22 IT IS SO STIPULATED.

23
24 DATED: January 14, 2019

SETAREH LAW GROUP

25
26 /s/ Shaun Setareh
27 SHAUN SETAREH
28 THOMAS SEGAL

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Attorneys for Plaintiff
ROXANNE SLUSHER

DATED: January 14, 2019

VORYS, SATER, SEYMOUR & PEASE LLP

/s/ Mark A. Knueve
MARK A. KNUEVE
DANIEL J. CLARK
GEORGE L. STEVENS

Attorneys for Defendants BIG LOTS STORES, INC.,
and BIG LOTS F&S, INC.

FILER’S ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that concurrence in
the filing of this document has been obtained from the other signatory above.

DATED: January 14, 2019

/s/ Shaun Setareh
SHAUN SETAREH

1 **~~PROPOSED~~ ORDER**

2 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

3 Having considered the Stipulation between counsel for Plaintiff ROXANNE SLUSHER and
4 Defendants BIG LOTS STORES, INC. and BIG LOTS F&S, INC, and good cause appearing
5 therefore, this Court hereby grants the joint stipulation to continue class certification briefing ad
6 hearing. This Court hereby ORDERS:

- 7 1. Plaintiff's deadline to file her motion for class certification is continued from March 31,
8 2019 to July 1, 2019.
- 9 2. The hearing on Plaintiff's motion for class certification is continued from June 13, 2019
10 at 1:30pm to ^{December 5,} ~~November 28,~~ 2019 at 1:30pm, or another date that is convenient to the
11 Court.

12 IT IS SO ORDERED.

13
14
15 DATED: 1/14/19



RICHARD SEEBORG
United States District Judge

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of January 14, 2019, a true and correct copy of the foregoing document was filed via the court’s CM/ECF filing system and a copy was delivered via the same on all attorneys of record.

/s/ Shaun Setareh
SHAUN SETAREH